

**EXHIBIT 119**

**FILED UNDER SEAL**

CONFIDENTIAL - ATTORNEYS' EYES ONLY

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS,

Plaintiff,

vs.

JPMORGAN CHASE BANK, N.A.,

Defendant.

Case No.

1:22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.,

Third-Party  
Plaintiff,

vs.

JAMES EDWARD STALEY,

Third-Party  
Defendant.

Wednesday, April 19, 2023

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Videotaped deposition of Phillip DeLuca, held  
at the offices of Ulmer & Berne, 65 East State Street,  
Columbus, Ohio, commencing at 9:06 a.m., on the above  
date, before Carol A. Kirk, Registered Merit Reporter,  
Certified Shorthand Reporter, and Notary Public.

GOLKOW LITIGATION SERVICES

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1 Jeffrey Epstein from the bank?

2 MR. KRAUSE: Objection.

3 You can answer.

4 A. Do I understand -- can you repeat  
5 that, please?

6 Q. Do you know the basis for AML  
7 Investigations' recommendation to exit  
8 Mr. Epstein from the bank?

9 A. I believe it was reputational  
10 risk.

11 Q. Reputational risk based on what?

12 A. Based on a prior conviction.

13 Q. A prior conviction for what?

14 A. Some type of sexual activity.

15 Q. Do you know when relative to  
16 Mr. Epstein's conviction the recommendation to  
17 exit him from the bank was made?

18 A. No, I don't.

19 Q. Do you recall whether AML  
20 Investigations recommended more than once that  
21 Mr. Epstein be exited from the bank?

22 A. I don't recall.

23 Q. Did you speak with Mr. Langford  
24 about the disagreement between Private Bank and

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1 [REDACTED]

2 [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 BY MS. OLIVER:

21 [REDACTED] [REDACTED] [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

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1 Q. What did he say in response?

2 A. "I'll get back to you."

3 Q. Do you recall anything else?

4 A. Pardon?

5 Q. Do you recall anything else about  
6 the call?

7 A. No.

8 Q. How was it left?

9 A. That he would get back to me.

10 Q. So did you ever hear back from  
11 Mr. Moyer?

12 A. About that? No.

13 Q. Did you ever hear back from anyone  
14 else at the FBI, whether an investigator, an  
15 agent, or otherwise?

16 A. No.

17 Q. Given your consistent dealings  
18 with law enforcement, how did you interpret the  
19 fact that the FBI never got back to you about  
20 Epstein?

21 A. That they weren't interested.

22 Q. Okay. One more topic, and then  
23 we'll be done.

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Q. Did anyone from JPMorgan's

Private Bank ever at any time try to dissuade

you personally from doing anything at all in

connection with Jeffrey Epstein?

A. No.

Q. Are you aware of any instance

where anyone from any of JPMorgan's businesses

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1     tried to dissuade you or any of your colleagues  
2     from doing anything at all relating to  
3     Jeffrey Epstein?

4             A.     I'm not aware of any of them.

5             [REDACTED]

6             [REDACTED]

7             [REDACTED]

8             [REDACTED]

9             [REDACTED]

10            [REDACTED]

11            [REDACTED]

12            [REDACTED]

13            [REDACTED]

14            [REDACTED]

15            Q.     You did or did not develop a good  
16     understanding of Maryanne Ryan's temperament and  
17     skills from your time working with her?

18            A.     Yes.

19            Q.     How skilled was Maryanne as an  
20     investigator?

21            A.     Maryanne was extremely skilled.

22            Q.     You did or did not develop a good  
23     understanding of Maryanne Ryan's temperament  
24     from your time working with her?